

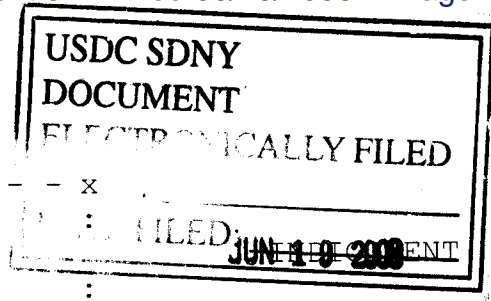
UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

LAVONNE EVANS,

Defendant.



08 Cr.

**08 CRIM 564**

COUNT ONE

The Grand Jury charges:

1. From on or about July 6, 2007, up to and including on or about October 4, 2007, in the Southern District of New York and elsewhere, LAVONNE EVANS, the defendant, unlawfully, willfully, and knowingly did execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution by means of false and fraudulent pretenses, representations, and promises, to wit, EVANS fraudulently obtained monies from the ETRADE BANK account of another person without that person's consent, defrauding ETRADE BANK of approximately \$225,000.

(Title 18, United States Code, Section 1344.)

FORFEITURE ALLEGATION

2. As a result of committing the offense alleged in Count One of this Indictment, LAVONNE EVANS, the defendant, shall forfeit to the United States pursuant to 18 U.S.C. § 982(a)(2)(A), any property constituting or derived from proceeds obtained directly or indirectly as a result of the offense charged in Count One.

Substitute Asset Provision

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

(i) cannot be located upon the exercise of due diligence;

(ii) has been transferred or sold to, or deposited with, a third person;


(iii) has been placed beyond the jurisdiction of the Court;

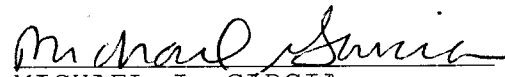
(iv) has been substantially diminished in value; or

(v) has been commingled with other property which cannot be subdivided without difficulty; it is the intent of the United States, pursuant to 18 U.S.C. § 982(b) and 21 U.S.C.

§ 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982(a)(2)(A) and (b), Title 21, United States Code, Section 853(p).)

  
FOREPERSON

  
MICHAEL J. GARCIA  
United States Attorney

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

LAVONNE EVANS,

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INDICTMENT

08 Cr.

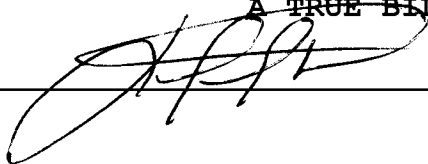
(18 U.S.C. § 1344)

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MICHAEL J. GARCIA  
United States Attorney.

~~A TRUE BILL~~

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Foreperson.

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